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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20544

In the Matter of: )  
)  
Replacement of Part 90 by )  
Part 88 to Revise the Private )  
Land Mobile Radio Services and )  
Modify the Policies Governing )  
Them )

P R Docket 92-235

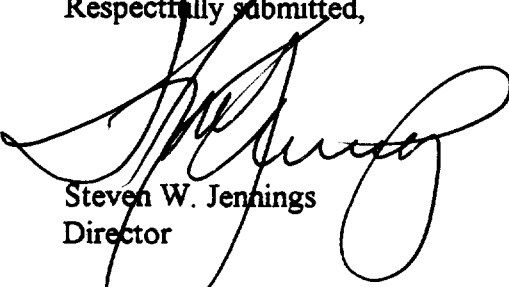
To: The Commission:

COMMENTS OF

HARRIS COUNTY DATA SERVICES AND COMMUNICATIONS CENTER

406 Caroline  
Houston, Texas 77002

Respectfully submitted,

  
Steven W. Jennings  
Director

May 24, 1993

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# **HARRIS COUNTY DATA SERVICES AND COMMUNICATIONS CENTER**

## **REFARMING ISSUES**

Docket 92-235

Comments by:

Harris County Radio Communications  
406 Caroline  
Houston, Texas 77002  
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1. The Federal Communications Commission is to be commended for efforts to increase the efficient use of the frequency bands below 512 MHz allocated to the Private Land Mobile Radio Services. Proposals provided in PR Docket 92-235 are very aggressive and set high goals for equipment users and manufacturers by specifying standards for spectrum efficiency.
2. Harris County, like many other metropolitan areas of the country, needs additional radio spectrum. Although the bulk of our radio communications utilizes 800 MHz trunking to cover almost 1800 square miles, we still depend upon the use of conventional operations within the 155 MHz band for in-building coverage for Public Safety.
3. Public Safety requires a very high level of flexibility in the ability to communicate by radio with neighboring agencies. Many agencies are unable to move fast enough to fund equipment to meet the proposed timetable. Many volunteer agencies rely solely upon donations of equipment and other systems for communications. Surplus equipment to meet those needs will not be

Radio equipment, manufacturers agree to be given a guaranteed new market at the

10. The cost of replacing existing radio equipment to meet the new operating standards is only part of the cost. New test equipment specifications for measuring and controlling the performance of new equipment must far exceed the standards which must be measured. The cost of sophisticated test equipment is currently excessive and the trend can only increase with the proposed rule making.

11. The proposed rule making will push Public Safety agencies toward the use of third party communication service providers. Public Safety spectrum should be limited to only government entities. Labor disputes and other unforeseen problems should not be introduced into the Public Safety communications arena.

12. Finally, "REFARMING" must provide the quality and reliability to maintain adequate radio communications for Public Safety operations. The proposed rule making does not appear to increase the quality or reliability of communications for Public Safety. It appears that Public Safety is the loser and the equipment manufacturers are the winners.

### **RECOMMENDATIONS**

The Radio Management of Harris County, Texas believes that the Consensus Plan Developed by the Land Mobile Communications Council ("LMCC") correctly reflects a practical approach for implementing a "graceful migration" to more efficient technologies. We recommend consideration of the Consensus Plan.